

September 4, 2018

Honorable Barbara Moses
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: ***Seidman v. GAX Productions, LLC (1:18-cv-2048-RA-BCM)***

Dear Judge Moses,

We represent Plaintiff, Helayne Seidman, in the above in captioned case. Plaintiff amended its discovery responses on August 23, 2018 before Defendant requested a motion to compel. Plaintiff's amended responses to Defendant's document request and interrogatories are sufficient and do warrant any motion to compel. Plaintiff is still looking to see if she has any more documents in her possession but so far has produced everything she has in response to Defendants requests. Fact discovery closes on September 18, 2018.

I attached to this letter Plaintiff's amend responses Defendant's request for production of documents and interrogatories.

Respectfully Submitted,

/s/Richard P. Liebowitz
Richard Liebowitz
Liebowitz Law Firm, PLLC
11 Sunrise Plaza, Suite 305
Valley Stream, NY 11580
(516) 233-1660
RL@LiebowitzLawFirm.com

Attorneys for Plaintiff Helayne Seidman